



## OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60  
Richland, Washington 99352

**MAR 28 2017**

17-ECD-0017

Ms. Alexandra K. Smith, Program Manager  
Nuclear Waste Program  
Washington State  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

Ms. Smith:

### AGREEMENT ON RESOLVING DANGEROUS WASTE MANIFEST INFORMATION

- References:
1. Ecology letter from K. Conaway to D.S. Shoop, RL, and T. Blackford, CH2M HILL, "Dangerous Waste Compliance Inspection on June 13, 2016 at the Central Waste Complex, RCRA Site ID: WA7890008967, NWP Compliance Index No. 16.575," 16-NWP-218, dated December 15, 2016.
  2. Ecology letter from J. Mathey to K.W. Smith, ORP, and M. Lindholm, WRPS, "Dangerous Waste Compliance Inspection on September 21, 2016, at the 242-A Evaporator, RCRA Site ID: WA7890008967, NWP Compliance Index No. 16.583," 16-NWP-219, dated December 20, 2016.
  3. Ecology letter from J. Mathey to K.W. Smith, ORP, and M. Lindholm, WRPS, "Dangerous Waste Compliance Inspection on August 30, 2016, at Liquid Effluent Retention Facility/Effluent Treatment Facility, RCRA Site ID: WA7890008967, NWP Compliance Index No. 16.580," 17-NWP-005, dated January 19, 2017.

U.S. Department of Energy (DOE) personnel met with Washington State Department of Ecology (Ecology) Compliance personnel on November 1, 2016, to discuss site addresses for the purpose of listing information on a hazardous waste manifest. The Uniform Hazardous Waste Manifest Item 5 requires the generator to "enter the physical site address from which the shipment originates only if this address is different than the mailing address." Hanford does not have a physical site address and cannot explicitly meet this requirement as written.

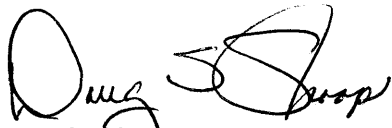
DOE and Ecology reached an agreement that Hanford would use "United States Department of Energy - Hanford Site" as the physical site address to be in compliance with the requirements of the Uniform Hazardous Waste Manifest. Ecology added that this agreement would be evaluated during future inspections for manifests for the purpose of resolution of all issues; old and new.

MAR 28 2017

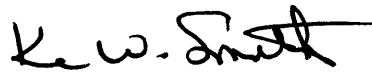
At this time, Ecology does not anticipate any new issues with Uniform Hazardous Waste Manifest Item 5. It was also agreed that each contractor could use their own name and mailing address as the generator, as appropriate.

Reference 3 correctly identified the physical address as agreed; however, References 1 and 2 incorrectly identified the physical site address as the "Hanford Site." Future Hanford manifests will use "United States Department of Energy - Hanford Site" for the physical site address.

If you have any questions, please contact Bryan R. Trimberger, Environmental Compliance Division, (509) 376-2674, or Duane B. Carter, DOE Richland Operations Office, (509) 376-8086.



Doug S. Shoop, Manager  
Richland Operations Office



Kevin W. Smith, Manager  
Office of River Protection

ECD:BRT

cc: D.J. Alexander, Ecology  
K.A. Conaway, Ecology  
S.L. Dahl-Crumpler, Ecology  
E.J. Holbrook, Ecology  
J.W. Mathey, Ecology  
J.B. Price, Ecology  
E.R. Skinnarland, Ecology  
D.B. Carter, RL  
C.E. Clark, RL  
G. Melo, RL  
A.K. Wright, RL  
Administrative Record  
Environmental Portal, LMSI